REMARKS

Introduction

Claims 1-42 are pending in the present application. Claims 37-42 were added in the amendment filed September 18, 2008. The Office Action does not contain any mention or disposition of claims 37-42.

Section 112 Rejections

In the Office Action, claim 6 was rejected under 35 U.S.C. § 112, ¶ 2, because the term "mapping module" lacks antecedent basis. Claim 6 has been amended to depend from claim 5, which includes antecedent basis for the term.

Prior Art Rejections

Claims 1-11, 14-24, and 27-36 were rejected under 35 U.S.C. § 102(e) as being anticipated by Foote (U.S. Patent 7,015, 954). Claims 12-13 and 25-26 were rejected as being obvious under 35 U.S.C. § 103(a) based on the combination of Foote and DiMatteo (U.S. Patent 4,396,945). In response, applicants have amended the pending claims to clarify the claimed inventions. Applicants submit that the pending claims are not anticipated by, or obvious in view of, the cited references for the reasons set forth below.

Focusing initially on independent claim 1, the claim is directed to a system for obtaining video of a moving fixation point within a scene. The claimed system includes, among other things, (i) a plurality of non-moving image capturing devices (e.g., cameras or camera banks), (ii) a plurality of image generators, each associated with one image

capturing device, and (iii) a surround-view image sequence generator. The image generators generate image frames based on images captured of the scene by the image capturing devices associated with each image generator. The surround-view image sequence generator generates an image sequence based on output from the image generators.

Claim 1 has been amended to clarify that the surround-view image sequence comprises "a sequence of image frames, wherein each image frame in the sequence is from one of the plurality of image generators and the image frames are sequenced based on a placement of the image capturing devices around the scene..." Claim 1 also has been amended to clarify that the surround-view image sequence generator is "for determining a viewing angle parameter and a zoom parameter for each of the image generators except the first image generator based on a command from the control unit such that the fixation point is in the image frame generated by each of the image generators and such that the size of a point of interest at the fixation point is the same for each image generator." Claim 1 also has been amended to clarify that the image generators, other than the first image generator, are configured "to generate the image frame based on the one or more images captured from the image generators' associated image capturing devices based on the viewing angle parameter and the zoom parameter received from the surround-view image sequence generator." Support for the claim amendments can be found throughout the application as originally filed.

Foote's video system also uses a plurality of non-moving image capturing devices. There are, however, several nonobvious differences between Foote's system and the system of claim 1, including:

First, Foote's video system does not disclose a surround-view image sequence generator that generates a surround-view video sequence that "comprises a sequence of image frames, wherein each image frame in the sequence is from one of the plurality of image generators and the image frames are sequenced based on a placement of the image capturing devices around the scene...," as recited in claim 1. In Foote, images from multiple image capturing devices are combined ***into a single, composite panoramic image view***. *See* Foote at col. 11:52-55 and Fig. 12. There is no teaching in Foote of a system that outputs separate images from each of a plurality of image generators in sequence, wherein each image generator is associated with an image capturing device, and the sequence of images is sequenced based on the position of the image capturing devices around the scene.

The Office Action, in rejecting now-canceled claim 4, states that this feature is disclosed at Fig. 12 and col. 11:59-62 of Foote. This portion of Foote, however, merely discloses combining images from multiple image capturing devices into ***one composite image***. It does not disclose generating a sequence of images, each image from one of the image generators, where the sequence is based on the position of the associated image capturing devices around the scene.

Second, Foote's system does not possess an image sequence generator that is for "determining a viewing angle parameter and a zoom parameter for each of the image generators except the first image generator based on a command from the control unit such that the fixation point is in the image frame generated by each of the image generators and such that the size of a point of interest at the fixation point is the same for each image generator," as recited in claim 1. In Foote, in contrast, the

resulting images are panned only by showing the images from the few cameras where the point of interest was in the field of view. *See* Foote at col. 6:19-30 and Figure 2A. Also, the zoom on the fixation point is controlled in Foote after the composite image is generated by reducing the resolution of the images that comprise ***the composite image***. *See* Foote at col. 6: 31-44. Thus, there is no determination of a viewing angle parameter and a zoom parameter such that the fixation point is in the field of view and the same size for each of the image generators in Foote.

The other reference cited in the Office Action, DiMatteo, does not cure these defects of Foote with respect to claim 1. DiMatteo's system uses moving cameras. Consequently, the Office Action only uses DiMatteo in combination with Foote to reject claims (e.g., claims 12-13 and 25-26) that also recite a moving camera system as being obvious. Therefore, the combination of Foote and DiMatteo does not teach or suggest all of the elements of claim 1.

For at least these reasons, applicants submit that claim 1 is not anticipated by or obvious in view of the cited references.

The other independent claims, i.e., claims 18, 27, 33, and 37, have been amended in a manner similar to claim 1. For analogous reasons, applicants submit that independent claims 18, 27, 33, and 37, as well as their respective dependent claims, are not anticipated by or obvious in view of the cited references.

Applicants do not concede the correctness of the Office Action's rejection with respect to any of the dependent claims. Accordingly, applicants hereby reserve the right to make additional arguments as may be necessary to distinguish further the dependent claims from the cited references, taken alone or in combination, based on

additional features contained in the dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

CONCLUSION

Applicants respectfully submit that all of the claims presented in the present application, as either amended or initially presented in this response, are in condition for allowance. Applicants' present Amendment should not in any way be taken as acquiescence to any of the specific assertions, statements, etc., presented in the Office Action not explicitly addressed herein. Applicants reserve the right to address specifically all such assertions and statements in subsequent responses.

Applicants have made a diligent effort to properly respond to the Office Action and believe that the claims are in condition for allowance. If the Examiner has any remaining concerns, the Examiner is invited to contact the undersigned at the telephone number set forth below so that such concerns may be expeditiously addressed.

Respectfully submitted,

Date: April 3, 2009

Mark Knedeisen

Mark G. Knedeisen
Reg. No. 42,747

K&L GATES LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, Pennsylvania 15222

Ph. (412) 355-6342
Fax (412) 355-6501
email: mark.knedeisen@klgates.com